

GOODWIN PROCTER

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March 21, 2014

BY FACSIMILE TO (212) 805-7986

Honorable Paul G. Gardephe
United States District Judge for the Southern
District of New York
40 Foley Square, Room 2204
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED. 3/24/14
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Re: *United States v. Mathew Martoma*, No. 12 Cr. 973 (PGG)

Dear Judge Gardephe:

Defendant Mathew Martoma, through Counsel, respectfully submits this letter requesting a temporary modification of his terms of release to allow him to travel to see his family living in the Chicago area from May 15, 2014 through May 19, 2014. During this time, Mr. Martoma would only be traveling to Chicago and other immediately surrounding areas located in Illinois to attend a family wedding.

By way of background, Mr. Martoma has been released on a personal recognizance bond of \$5 million, secured by \$2 million cash and/or real property. In addition, Mr. Martoma was ordered to surrender his passport, as well as those of his minor children, and travel was restricted to the Southern District of New York, Eastern District of New York, Florida (all districts), and the districts of Massachusetts and New Jersey. Mr. Martoma has previously requested temporary modifications of his terms of release in two other instances for the purpose of traveling with his family. The first request was submitted to the Court in a letter dated August 14, 2013, and granted on August 16, 2013. That trip was cancelled, however, following the Government's filing of a superseding indictment on August 22, 2013. Mr. Martoma then renewed this request to the Court in a letter dated December 10, 2013, which was granted on December 11, 2013.

The defense requests that the Court modify Mr. Martoma's conditions of release to permit him to travel on May 15, 2014 from Florida to Chicago, Illinois by air, to visit Chicago and immediately surrounding areas, and to return on or before May 19, 2014 to Florida by air.

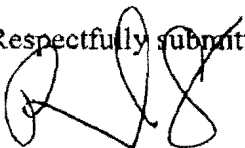
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We have spoken to Mr. Martoma's pre-trial services officer, and he assents to this request. We have also reached out to Assistant U.S. Attorneys Arlo Devlin-Brown and Eugene Ingoglia, and they consent as well.

Accordingly, we request that Mr. Martoma's conditional release be modified to permit travel to Illinois from May 15, 2014 through May 19, 2014.

Respectfully submitted,

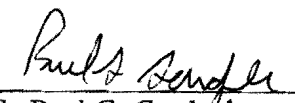


Richard M. Strassberg

cc: Arlo Devlin-Brown, AUSA
Eugene Ingoglia, AUSA

Roberto Braceras, Goodwin Procter LLP

SO ORDERED this 21st day of March
2014



Honorable Paul G. Gardephe
United States District Judge